

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY <b>Caption in compliance with D.N.J. LBR 9004-1(b)</b>	
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In re:	Chapter 11
LTL MANAGEMENT LLC,	Case No. 23-12825 (MBK)
Debtor. <sup>1</sup>	<b>Hearing Date and Time:</b> May 22, 2023 at 10:00 a.m. ET

**NOTICE OF MOTION TO SEAL THE REDACTED PORTIONS OF  
ARNOLD & ITKIN'S MEMORANDUM OF LAW IN SUPPORT OF  
MOTION TO DISMISS CHAPTER 11 CASE AND CERTAIN EXHIBITS THERETO**

**PLEASE TAKE NOTICE** that Arnold & Itkin LLP ("Arnold & Itkin"), on behalf of certain talc personal injury claimants represented by Arnold & Itkin, by and through its counsel, will move (the "Motion to Seal") on May 22, 2023 at 10:00 a.m. (ET) (the "Return Date") before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, pursuant to sections 105(a) and 107(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), Rule 9018 of the Federal Rules of Bankruptcy

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Procedure (the “Bankruptcy Rules”), and D.N.J. LBR 9018-1 (the “Local Rules”), for authorization to file under seal the redacted portions of the memorandum of law in support of Arnold & Itkin’s motion to dismiss the Debtor’s chapter 11 case (the “Motion to Dismiss”) and certain exhibits attached to the declaration of Laura Davis Jones (the “Jones Declaration”) filed with the Motion to Dismiss.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) Arnold & Itkin’s undersigned counsel, (b) Debtor’s counsel, (c) the proposed counsel to the Official Committee of Talc Claimants, (d) the Office of the United States Trustee, and (e) any other party entitled to notice so they are received no later than seven (7) days before the Return Date.

**PLEASE TAKE FURTHER NOTICE** that, unless an objection is timely filed and served, the Motion to Seal will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

*[Remainder of page intentionally left blank]*

**PLEASE TAKE FURTHER NOTICE** that the Return Date on the Motion to Seal is being scheduled contemporaneously with the Motion to Dismiss, which is currently scheduled to be heard on May 22, 2023 at 10:00 a.m. (ET).

Dated: May 1, 2023

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ Colin R. Robinson*

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